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**GANNETT FLEMING  
ENVIRONMENTAL ENGINEERS, INC.**



P. O. BOX 1963  
HARRISBURG, PA 17105  
(717) 763-7211

CABLE ADDRESS GANFLEC • TELEX 84-2375

October 3, 1988

Mr. Michael Towle  
U.S. Environmental Protection Agency  
Region III  
CERCLA Remedial Enforcement Section (3 HW 12)  
841 Chestnut Street, Sixth Floor  
Philadelphia, Pennsylvania 19107

Dear Mr. Towle:

Re: 3 RC 22  
Butler Tunnel Site

On behalf of Mr. A.B.M. Houston, Respondents' Project Coordinator,  
there is transmitted herewith one copy of monthly progress report no. 17.  
Your questions or comments should be directed to:

Mr. A.B.M. Houston  
c/o Ford Motor Company  
SSECO - Suite 608  
15201 Century Drive  
Dearborn, Michigan 48120

Telephone: (313) 594-0324

Very truly yours,

GANNETT FLEMING ENVIRONMENTAL ENGINEERS, INC.

A. F. MIORIN  
Project Manager

cc: Mr. A.B.M. Houston (with enclosure)  
PRPs and Technical Committee (with enclosure)

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afmrh002

AR204920

GANNETT FLEMING

BUTLER MINE TUNNEL SITE

U.S. EPA Docket No. III-87-II-DC

Monthly Progress Report No. 17  
For the Period  
Of September 7, 1988 - September 30, 1988

Section IX, Paragraph 10 Of  
Administrative Order By Consent  
Effective Date Of April 29, 1987

Prepared by: Gannett Fleming  
Environmental Engineers, Inc.

For: Respondents

Date: September 30, 1988  
AR 204921

I. Description Of Actions Taken

EPA and DER commenced to put in place the Heidelberg Colliery flushing project monitoring, sampling and analytical program. A borehole accessing the free water surface of the Heidelberg Colliery pool was installed, as was a borehole into the no. 2 pool of the Butler Colliery at the location near the Heidelberg Colliery barrier. It is understood that EPA still intends to install another borehole in the vicinity of no. 2-A as proposed by Respondents in the Phase II RI/FS Work Plan.

Monitoring of Heidelberg Colliery and Butler Colliery no. 2 pool elevations by EPA has started. In addition, DER sampling and analysis of the Tunnel outfall and Heidelberg Colliery pool has commenced. The EPA sampling and analytical effort will get underway on October 3rd, at which time EPA on a selective basis will commence to split samples with the Respondents. Respondents will also during the week of October 3rd commence the independent sampling, and analysis, of Butler Tunnel discharges.

It is currently understood that the hydraulic flushing of material into the Heidelberg Colliery is scheduled to commence sometime between the beginning and middle of November.

II. Information And Data Generated Or Received

Respondents were advised in mid-September by the Department of Justice (DOJ) that its file search had been completed. After arrangements had been made for review of the file at DOJ, said review session was cancelled by DOJ. DOJ stated that additional time was required to further assess the extent of the information and data that would be made available to Respondents.

AR204922

III. Activities Scheduled For Next Monthly Period

EPA will commence the sampling of Butler Tunnel discharges, and liquids from certain boreholes as part of the flushing project sampling and analytical program. EPA will split various samples with Respondents, for subsequent analysis by Respondents.

Respondents will continue to prepare for submittal to EPA a letter identifying the additional tasks they propose to implement during the course of the flushing project.

IV. Problems Encountered

As noted in the prior monthly progress report, Respondents have a concern with signing the Administrative Order realizing that the current Work Plan may be subject to revision. This concern will be further addressed in the letter noted in Section III of this report.